

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: ANGELA M. AREHART : CHAPTER 13
: NO. 17-16585AMC

AMENDED OBJECTION TO CERTIFICATION OF DEFAULT

Mudrick & Zucker, P.C., attorneys for Debtor, hereby object to Movant's Certification of Default filed with the Court on June 2, 2023, Document No. 169, based upon the following:

Debtor has been making payments to Movant.

Debtor paid the sum of \$7,192.25 to Movant on January 12, 2024, Confirmation No. 1256020963.

Debtor paid the sum of \$7,192.25 to Movant on February 14, 2024, Confirmation No. 1297741489.

Debtor paid the sum of \$7,192.25 to Movant on March 1, 2024, Confirmation No. 1317157625.

Debtor paid the sum of \$3,732.07 to Movant on April 17, 2024, Confirmation No. 1372280975.

Debtor paid the sum of \$4,000.00 to Movant on May 28, 2024, Confirmation No. 1415588927.

Debtor paid the sum of \$4,000.00 to Movant on June 26, 2024, Confirmation No. 1451455581.

WHEREFORE, the Debtor requests that this Court deny Movant's Certification of Default.

Dated: 7/09/2024

/s/ Daniel P. Mudrick
DANIEL P. MUDRICK, ESQUIRE
Attorney for Debtor
325 Sentry Parkway East
Building 5 West, Suite 320
Blue Bell, PA 19422
(610) 832-0100